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EUGENE MALISZEWSKYJ
ENGINEERING CONSULTANT

June 30 2015

ARTHUR BLOOSTON
1914 – 1999

WRITER'S CONTACT INFORMATION

sta@bloostonlaw.com
202-828-5562

REDACTED – FOR PUBLIC INSPECTION

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

RE: Form 481 – Carrier Annual Reporting Data Collection, 2015
WC Docket No. 14-58

Dear Ms. Dortch:

Pursuant to sections 54.313(i) and 54.422(c) of the Commission's Rules,¹ Walnut Hill Telephone Company (the Company) hereby submits a copy of its "FCC Form 481 – Carrier Annual Reporting Data Collection Form," as filed with the Universal Service Administrative Company. A copy is also being submitted to the appropriate state regulatory commission and tribal government, as further required by sections 54.313(i) and 54.422(c).

Pursuant to the Protective Order adopted by the Commission in this proceeding,² the Company requests confidential treatment for the financial information included in its report, as required by §54.313(f)(2), on the grounds that it is commercially sensitive information that is not normally released to the public. The Company also requests confidential treatment for its

¹ 47 CFR §§54.313 and 54.422.

² *In the Matter of Connect America Fund, et al.*, PROTECTIVE ORDER, WC Docket No. 10-90, et al., DA 15-712, released June 17, 2015.

Progress Report on the Five Year Service Quality Plan pursuant to sections 0.457 and 0.459 of the Commission's Rules. A letter in support of the Company's request is attached hereto.

In accordance with the Protective Order and the Commission's rules, two redacted copies and one non-redacted copy have been submitted on paper via hand delivery to the Secretary's Office, two non-redacted copies have been submitted for hand delivery to Mr. Charles Tyler of the Telecommunications Access Policy Division, and a redacted copy has also been filed via the Electronic Comment Filing System.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to be 'JH' with a large horizontal stroke extending to the right.

Salvatore Taillefer, Jr.

Counsel to Walnut Hill Telephone Company

CC:

Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: Form 481 – Carrier Annual Reporting Data Collection, 2015
WC Docket No. 14-58

Dear Ms. Dortch:

Pursuant to §0.457 and §0.459 of the Commission's rules, Walnut Hill Telephone Company (the "Company"), by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, the Company requests confidential treatment of the Progress Report on the Five Year Service Quality Improvement Plan (the "Plan" or "confidential information") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under § 0.459(b) of the Commission's rules, the Company states the following:

1. Identification of the specific information for which confidential treatment is sought.

The Company seeks confidential treatment of the Progress Report on the Five Year Service Quality Improvement Plan, attachment 112 to the Form 481 filing accompanying this letter, which contains sensitive financial information about the Company as well as information about the Company's projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

2. *Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.*

The documents are being submitted as part of the annual Eligible Telecommunications Carrier Report (Form 481) mandated by section 54.313 of the Commission's rules.

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that "would customarily be guarded from competitors,"¹ and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and Section 0.457(d) of the Commission's rules.²

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

The Plan relates to voice and broadband services provided by the Company that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the confidential information is likely to result in substantial competitive harm to the Company because the confidential information could provide competitors with commercially sensitive insights related to the Company's operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

The Company does not make the Progress Report on the Five Year Service Quality Improvement Plan or any of the information contained therein publically available in any way and further limits internal access to key employees subject to strict non-disclosure obligations.

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

The Company does not make the confidential information available to the public and it has not previously allowed disclosure of the confidential information to third parties that are not otherwise bound by confidentiality obligations.

¹ *Id.* § 0.457(d)(2).

² 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).

8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.*

The confidential information should be treated as confidential for an indefinite period, as the Company will always be subject to competition and the competitive harms associated with the disclosure of the confidential information.

In order to provide adequate protection from public disclosure, the Commission should strictly limit distribution of the confidential information within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside the Commission requests disclosure of the confidential information, the Company requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Salvatore Tallefer, Jr.', is written over the printed name.

Salvatore Tallefer, Jr.
Counsel for
Walnut Hill Telephone Company

FCC Form 481 - Carrier Annual Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0066/OMB Control No. 3060-0065 July 2013
<010>	Study Area Code	401725
<015>	Study Area Name	WALNUT BIRCH, KYL CO
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	Amanda Molina
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9044837537 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	amolina@comcast.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100>	Service Quality Improvement Reporting	✓	✓
<200>	Outage Reporting (voice)	✓	✓
<210>	<input checked="" type="checkbox"/> -- check box if no outages to report	✓	✓
<300>	Unfulfilled Service Requests (voice)	0	0
<310>	Detail on Attempts (voice)	[]	[]
(attach descriptive document)			
<320>	Unfulfilled Service Requests (broadband)	0	0
<330>	Detail on Attempts (broadband)	[]	[]
(attach descriptive document)			
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed	0.0	0.0
<420>	Mobile	0.0	0.0
<430>	Number of Complaints per 1,000 customers (broadband)		
<440>	Fixed	0.0	0.0
<450>	Mobile	0.0	0.0
<500>	Service Quality Standards & Consumer Protection Rules Compliance	✓	✓
(check to indicate certification)			
<510>	401725x510.pdf []	✓	✓
(attach descriptive document)			
<600>	Functionality in Emergency Situations	✓	✓
(check to indicate certification)			
<610>	401725x610.pdf []	✓	✓
(attach descriptive document)			
<700>	Company Price Offerings (voice)	✓	✓
<710>	Company Price Offerings (broadband)	✓	✓
<800>	Operating Companies and Affiliates	✓	✓
<900>	Tribal Land Offerings (Y/N)?	[]	[]
<1000>	Voice Services Rate Comparability Certification	Yes	Yes
(attach descriptive document)			
<1010>		[]	[]
<1100>	Certify whether terrestrial backhaul options exist (Yes or No)	[]	[]
(if not, check to indicate certification)			
<1110>		[]	[]
(complete attached worksheet)			
<1200>	Terms and Condition for Lifeline Customers	[]	[]
(complete attached worksheet)			
Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet			
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers			
<2000>		[]	[]
<2005>		[]	[]
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>		[]	[]
<3005>		[]	[]

**100 Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 401729
 <015> Study Area Name WALNUT HILL TEL CO
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Amanda Molina
 <035> Contact Telephone Number - Number of person identified in data line <030> 5044037533 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> amolina@townas.net

<110> Has your company received its ETC certification from the FCC? (yes / no) ☐ ☒
 If your answer to Line <110> is yes, do you have an existing §54.202(a) "5
 <111> year plan" filed with the FCC? (yes / no) ☐ ☐

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

401729ar112.pdf

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets
 <114> Report how much universal service (USF) support was received
 <115> How much (USF) was used to improve service quality and how support was used to improve service quality
 <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
 <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Yes

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<010>	Study Area Code	401729
<015>	Study Area Name	WALNUT HILL TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

REDACTED - FOR PUBLIC INSPECTION

<010>	Study Area Code	401729
<015>	Study Area Name	WALNUT HILL TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

<701>	Residential Local Service Charge Effective Date	1/1/2015
<702>	Single State-wide Residential Local Service Charge	

[illegible]

<010>	Study Area Code	401729
<015>	Study Area Name	WALNUT HILL TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

<010>	Study Area Code	401729
<015>	Study Area Name	WALNUT HILL TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Ananda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net
<810>	Reporting Carrier	Walnut Hill Telephone Company
<811>	Holding Company	Townes Telecommunications, Inc.
<812>	Operating Company	Walnut Hill Telephone Company

Affiliates	SAC	Doing Business As Company or Brand Designation
-- See attached worksheet --		

(900) Tribal Lands Reporting Data Collection Form	PCO Form 481 OMB Control No. 3060-0289 / OMB Control No. 3060-0819 11/02/13
--	---

<010> Study Area Code 401729
 <015> Study Area Name WAIAHITI HILLS TRL CO
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Amanda Molina
 <035> Contact Telephone Number - Number of person identified in data line <030> 3044937533 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> amolina@tonnes.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
 <922> Feasibility and sustainability planning;
 <923> Marketing services in a culturally sensitive manner;
 <924> Compliance with Rights of way processes
 <925> Compliance with Land Use permitting requirements
 <926> Compliance with Facilities Siting rules
 <927> Compliance with Environmental Review processes
 <928> Compliance with Cultural Preservation review processes
 <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

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(1100) No Terrestrial Backhaul Reporting Data Collection Form	FCC Form 481 OMB Control No. 3050-0926/OMB Control No. 3060-0819 July 2013
--	--

<010> Study Area Code	401729
<015> Study Area Name	WALNUT HILL TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035> Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

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(1200) Terms and Condition for Lifeline Customers	FCC Form 481
Lifeline	OMB Control No. 3060-0986/CMB Control No. 3060-0819
Data Collection Form	July 2015

<010>	Study Area Code	401729
<015>	Study Area Name	WALNUT HILL TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

401729ar1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

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2000) Price Cap Carrier Additional Documentation	OMB Form 481-101
Data Collection Form	OMB Control No. 3065-0086/OMB Control No. 3065-0019
Including Rate of Return Carriers Affiliated With Price Cap Local Exchange Carriers	July 2013

<010>	Study Area Code	401729
<015>	Study Area Name	
<020>	Program Year	WALNUT HILL, G24 CO
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	AMANDA MORINA
<039>	Contact Email Address - Email Address of person identified in data line <030>	3044077333@xcl
		3044077333@xcl

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a redplent of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)(i))
- <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)(i))
- <2011b> Attachment (47 CFR § 54.313(b)(1)(i))

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a redplent of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

Name of Attached Document(s) Listing Required Information

- <2021> Interim Progress Community Anchor Institutions

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3000 Rate Of Return Carrier Additional Documentation		Form 3000
Data Collection Form		OMB Control No. 3045-0045
Date		2015

<010> Study Area Code	401729
<015> Study Area Name	WASHUT RILL TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035> Contact Telephone Number - Number of person identified in data line <030>	9244037513 ext.
<038> Contact Email Address - Email Address of person identified in data line <030>	amolina@rcwncs.net

Include the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.302(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

401729ar3010.pdf

(3010) Progress Report on 5-Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3012) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(i), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☒

401729ar3012.pdf

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))?

(3014) If yes, does your company file the RUS annual report? ☒ Yes ☒ No

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.315(f)(2) compliance request:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☐

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? ☒ Yes ☐ No

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3025 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☐

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit ☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3025 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☒

(3023) Underlying information subjected to a review by an independent certified public accountant ☒

(3024) Underlying information subjected to an officer certification ☒

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

401729ar3025.pdf

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

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3000 Rate Of Return Information Documentation (continued)		Form 489
Data Collection Form		OMB Control No. 3060-0045/OMB Control No. 3060-0045
		10/2013
<010> Study Area Code	402729	
<015> Study Area Name	WATNUT HILL TEL CO	
<020> Program Year	2016	
<030> Contact Name - Person USAC should contact regarding this data	Amanda Molina	
<035> Contact Telephone Number - Number of person identified in data line <030>	9244027533_ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	amolin@townes.net	

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant in Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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Certification - Reporting Carrier	EC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	JULY 2013

<010> Study Area Code	401729
<015> Study Area Name	WALNUT HILL TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Amanda Molina
<035> Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	amolina@townes.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: WALNUT HILL TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/20/2015
Printed name of Authorized Officer: Deborah Nobles	
Title or position of Authorized Officer: VP of Regulatory Affairs	
Telephone number of Authorized Officer: 9042590029 ext.	
Study Area Code of Reporting Carrier: 401729	Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier		PC Form 481
Data Collection Form		OMB Control No. 3067-0186/CMB Control No. 7050-0819
		July 2013
<010> Study Area Code	401729	
<015> Study Area Name	WALNUT HILL IRL CO	
<020> Program Year	2016	
<030> Contact Name - Person USAC should contact regarding this data	Amanda Molina	
<035> Contact Telephone Number - Number of person identified in data line <030>	904037533 ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	amolina@towne.net	

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

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Attachments

REDACTED - FOR PUBLIC INSPECTION

LINE 112: PROGRESS REPORT

REDACTED IN ENTIRETY

Carrier Name: Walnut Hill Telephone Company
Carrier SPIN: 143002277
Carrier SAC: 401729
Operating State: Arkansas

Line 510: Service Quality Standards and Consumer Protection Rules Compliance for voice and broadband services

Walnut Hill Telephone Company ("Walnut Hill" or "the Company") complies with the Arkansas Public Service Commission's Telecommunications Providers Rules in its entirety and adheres to all service quality standards and consumer protection rules.

Walnut Hill complies with the following federal consumer protection rules and regulations:

FCC 47 C.F.R. §§64.2001-64.2011 – Customer Proprietary Network Information ("CPNI")
FTC 16 C.F.R. §681.2 – Identity Theft Red Flags and Address Discrepancies Under the Fair and Accurate Credit Transactions Act of 2003
All customer protection and disclosures established by the Fair Credit Reporting Act (15 U.S.C. §§1681, *et seq.*) and the Truth in Lending Act (15 U.S.C. §§1601, *et seq.*)

The Company has a CPNI Policy Manual detailing and enforcing the requirements of the federal CPNI rules. Each year, the CPNI Compliance Officer (1) communicates with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervises the training of Company employees and agents who use or have access to CPNI; (3) supervises the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture partners; (4) maintains records regarding the use of CPNI in marketing campaigns; and (5) receives, reviews and resolves questions or issues regarding use, disclosure, distribution or provision of access to CPNI. The CPNI Compliance Officer certifies compliance annually with the FCC by March 1.

The Company has an Identity Theft Prevention Program ("the Program") that was approved by the Board of Directors in September 2008. The Board appointed Red Flag Coordinator is responsible for updating the Program as necessary; the day-to-day supervision of the Program; training Company employees regarding their responsibilities with respect to the Program; and responding to employee questions and concerns regarding identity theft or the Program. The Red Flag Coordinator is required to annually prepare an Identity Theft Prevention Program Compliance Report for the Board's approval by October 1. The Identity Theft Prevention Program Compliance Report evaluates the effectiveness of the Program; the nature and extent of the Company's service provider arrangements and their impact on the effectiveness of the Program; reports any significant incidents involving identity theft and the Company's response to such incidents; and provides recommendations to the Board for periodic reviews of the Program and the adoption of material changes and other revisions, modifications and updates to the Program.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of

accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

Carrier Name: Walnut Hill Telephone Company
Carrier SPIN: 143002277
Carrier SAC: 401729
Operating State: Arkansas

Line 610: Functionality in Emergency Situations for voice and broadband services

Walnut Hill Telephone Company ("Walnut Hill" or "the Company") has an Emergency Operations Plan ("EOP" or "the Plan") that addresses the requirements for continuity of service and systematic restoration of service after loss of service due to an emergency. The EOP is administered and maintained by a member of senior management of the parent company, Townes Telecommunications, Inc., and is reviewed annually to ensure that each applicable section is accurate and any changes or updates to the Plan are made on a timely basis.

An Emergency Director has been authorized to implement the provisions of the EOP. The Emergency Director conducts training with employees and is responsible for ensuring that all new employees are provided a 30 minute overview of the Plan as part of their orientation. Specific supervisory personnel receive additional intense instructions regarding special areas of the Plan.

The Plan established an Emergency Committee made up of senior management and key company personnel, who upon notification by the Emergency Director that a potential emergency exists, convene to declare an emergency, notify affected parties and assume control of restoration of service efforts.

An emergency control center is established at the Company's business office, which is equipped with a back-up power generator and a wireless telephone set. Depending upon the severity and type of emergency and the safety of the emergency location, a control center may be established at the site of the event.

In case of power outages, batteries in the central office will last on average from 4-8 hours depending on how many lines (AMP load) are served at that particular location. The stand-by generator has 24 hour diesel capacity and small generators are available to be put on smaller concentrators if power is lost. The small generators have to be refueled every few hours.

The Company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

<010>	Study Area Code	401729
<015>	Study Area Name	WAINUT HILL TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Amenda Molina
<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	amolina@comcast.net

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2015

<703>

[illegible]

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REDACTED - FOR PUBLIC INSPECTION

<p>710) Broadband Price Offerings</p> <p>Data Collection Form</p>	<p>PCB No. 742</p> <p>QVE Control No. 3060-0835/QVE Control No. 3050-0313</p> <p>July 2013</p>
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<p>710) Broadband Price Offerings</p> <p>Data Collection Form</p>	<p>PCB No. 742</p> <p>QVE Control No. 3060-0835/QVE Control No. 3050-0313</p> <p>July 2013</p>
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<010>	Study Area Code	401726
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<015>	Study Area Name	WALNUT HILL TSL CO
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Program Year		2016	
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<Q30>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
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<035> Contact Telephone Number - Number of person identified in data line <030> 9046037533 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> amolima@townies.net

<711>	<61>	<52>	<43>	<34>	<25>	<16>	<7>	<0>
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[illegible]

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Data Collection Form

FCC Form 481

OMB Control No. 3060-0086/OMB Control No. 3060-0815

JULY 2013

<010> Study Area Code	401729
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<015>	Study Area Name	WALNUT HILL TEL CO
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<020>	Program Year	2016
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<030>	Contact Name - Person USAC should contact regarding this data	Amanda Molina
-------	---	---------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	9044037533 ext.
-------	---	-----------------

<039> Contact Email Address - Email Address of person identified in data line <030> amolina@townes.net

<810> Reporting Carrier Walnut Hill Telephone Company

<811> Holding Company	Townes Telecommunications, Inc.
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<812> Operating Company Walnut Hill Telephone Company

[illegible]

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REDACTED - FOR PUBLIC INSPECTION

Carrier Name: Walnut Hill Telephone Company
 Carrier SPIN: 143002277
 Carrier SAC: 401729
 Operating State: Arkansas

Line 1210: Terms and Conditions for Lifeline Program Customers

Walnut Hill Telephone Company ("Walnut Hill" or "the Company") complies with the FCC CFR 47 §§54.4, Universal Service Support for Low-Income Customers. The Company has developed a Lifeline Program Policy & Procedures Manual, which incorporates the federal Low-Income Program requirements. Lifeline is a non-transferable retail service offering for which qualifying low-income consumers receive a \$9.25 federal discount on flat rated basic local telephone service, whether it is purchased on a stand-alone basis or as part of a bundled service that includes voice and data services and optional calling features. Lifeline customers are charged a separate charge for toll calls, but are provided Toll Blocking free of charge if they elect to subscribe to the service. The Lifeline supported services are as shown below:

	Walnut Hill	
Residence Access Line	16.00	
Federal SLC	6.50	
Total Monthly Rate	22.50	
<u>Lifeline Discounts to Total Monthly Rate:</u>		
Federal Flat Rate Lifeline Support	(9.25)	<i>FCC 497: Lifeline Worksheet</i>
Total Lifeline Service Monthly Rate	(9.25)	
Net Monthly Local Service for Lifeline Customer	13.25	

Additional Services:

Toll Blocking is free to Lifeline customers who subscribe to this service.

The company is required to include the Lifeline Service Program in their Local Exchange Tariff. The rates for basic local residential service are also contained in the Local Exchange Tariff and the rates for the federal SLC are included in the NECA Tariff No. 5. Changes to any of these rates must be approved by the appropriate regulatory agency.

Carrier Name: Walnut Hill Telephone Company
Carrier SPIN: 143002277
Carrier SAC: 401729
Operating State: Arkansas

Line 3010: Milestone Certification

Walnut Hill Telephone Company ("Walnut Hill" or "the Company"), pursuant to, and in accordance with, F.C.C. 47 C.F.R § 54.202(a) and § 54.313(f)(1)(i), hereby submits this letter of certification that the Company is taking reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4Mbps downstream/1Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time.

Carrier Name: Walnut Hill Telephone Company
Carrier SPIN: 143002277
Carrier SAC: 401729
Operating State: Arkansas

Line 3012: Data on Community Anchor Institutions

Walnut Hill Telephone Company ("Walnut Hill" or "the Company"), pursuant to, and in accordance with, F.C.C. 47 C.F.R § 54.313(f)(1)(ii), hereby submits the number, names, and addresses of community anchor institutions to which the Company newly began providing access to broadband service in the preceding calendar year.

1. Walnut Hill Telephone Company does not have any newly served community anchor institutions to submit because all community anchor institutions are already being served.

LINE 3026: FINANCIAL WORKSHEET

REDACTED IN ENTIRETY